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8 RAMESH "SUNNY" BALWANI

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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION
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14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 v.
17 RAMESH "SUNNY" BALWANI,
18 Defendant.
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Case No. 5:18-cr-00258-EJD

**STIPULATION AND [PROPOSED]
ORDER TO PERMIT TRAVEL**

Hon. Edward J. Davila

1 Defendant Ramesh “Sunny” Balwani and the government, by and through their
2 undersigned counsel, stipulate to the following:

3 1. On December 7, 2022, after sentencing Mr. Balwani, this Court ordered that all
4 present conditions of release shall remain in effect pending the reporting date.

5 2. Mr. Balwani is currently on release pending execution of sentence, and remains
6 subject to the Court’s June 15, 2018 Order Setting Conditions of Release and Appearance Bond
7 (Dkt. No. 8), as modified by the Court’s July 14, 2022 Order Regarding Conditions of Release
8 and Appearance Bond (Dkt. No. 1511).

9 3. Mr. Balwani asserts that he is in full compliance with all bond requirements.

10 4. The Court’s July 14, 2022 Order provides that Mr. Balwani must not travel outside
11 the Northern District of California without the approval of Pretrial Services and notice to the
12 government.

13 5. Mr. Balwani wishes to travel from the Northern District of California to Cuyahoga
14 and Lorain Counties, within the Northern District of Ohio, to be with his family over the holidays.
15 Mr. Balwani plans to travel to Ohio on or about December 17, 2022, and return to the Northern
16 District of California on or about January 5, 2023. The government and the Pretrial Services
17 Office have no objection to these travel plans, but the Pretrial Services Office requested
18 authorization by the Court for the travel.

19 6. Counsel for Mr. Balwani has conferred and shared a copy of this stipulation with
20 the Pretrial Services Office.

21 7. Accordingly, Mr Balwani asks that the Court enter the Order below permitting the
22 requested travel.

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25 **IT IS SO STIPULATED.**
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2 DATED: December 12, 2022

Respectfully submitted,

3 ORRICK, HERRINGTON & SUTCLIFFE LLP
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5 /s/ Jeffrey B. Coopersmith

6 JEFFREY B. COOPERSMITH
7 Attorney for Defendant
8 RAMESH “SUNNY” BALWANI

9 DATED: December 12, 2022

Respectfully submitted,

10 STEPHANIE M. HINDS
11 United States Attorney

12 /s/ Robert S. Leach

13 ROBERT S. LEACH
14 JEFF SCHENK
15 JOHN C. BOSTIC
16 KELLY VOLKAR
17 Assistant United States Attorneys
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[PROPOSED] ORDER

Pursuant to the parties' stipulation, and for good cause shown, the Court **ORDERS** as follows:

1. Mr. Balwani is authorized to travel during the period December 17, 2022 to January 5, 2022 from his residence in the Northern District of California to Cuyahoga and Lorain Counties within the Northern District of Ohio for the purpose of visiting with his family.
2. Mr. Balwani shall provide his itinerary for the travel to the Pretrial Services Office and to the government at least two days before departing from the Northern District of California.
3. Mr. Balwani shall check in as directed by the Pretrial Services Office.
4. All other conditions of release remain in effect.

Dated: December ___, 2022

EDWARD J. DAVILA
UNITED STATES DISTRICT JUDGE